



Association of Primate Veterinarians

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September 2nd, 2018

Secretary of Transportation
United States Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590
Attn: Blane A. Workie, Assistant General Counsel for Aviation Enforcement Proceedings

Re: Submission in *NABR v. United Airlines et al.* Docket No. DOT-OST-2018-0124

Dear Madam Secretary:

The Association of Primate Veterinarians (APV) is submitting this letter to provide the Department of Transportation with information relevant to its evaluation of the above referenced complaint, which alleges various airlines refuse to carry animals for critical biomedical research but carry them for other purposes, such as personal pets or service animals.

The APV organization is globally composed of ~450 Veterinarians focused on humane care and welfare of nonhuman primates in captive breeding and research. This group includes academic, pharmaceutical, contract research organizations (CRO), governmental, and National Primate Research Centers veterinarians and their affiliates. Nonhuman Primates (NHP) studies have significantly contributed and continue to contribute to basic and translational biomedical research. The study and use of NHPs have led to breakthroughs in preventative medicine treatments and the continued successful management and understanding of many areas of medicine, a few examples include: infectious diseases (HIV), neurodegenerative diseases (Alzheimer's, Parkinson's) and stroke, endocrine disorders (Diabetes), reproductive disorders (Endometriosis), vaccine developments (Zika virus), and the list goes on (<https://news.ohsu.edu/2017/03/13/the-critical-role-of-nonhuman-primates-in-medical-research>). APV is in full support of NABR's complaint due to the lack of adequate NHP supply in North America and the highly collaborative and global nature of translational research occurring each day. Without the ability to move research models from breeder to research institutions or from one country to another, critical scientific research seeking cures and/or greater understanding of a disease process may be stopped. Simply stated there is tremendous need to have continued NHP airline transport (which is highly regulated and adequately controlled) to ensure continued progress in the field of biomedical research. It should be noted that on average NHPs are placed on study at 2-5

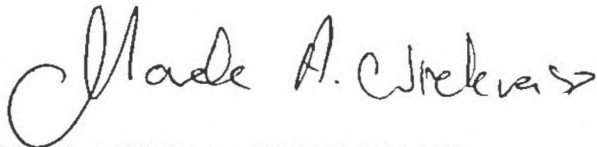
years of age, the clear majority of NHP breeding and supply is in other countries due to the ability to house animals outdoors (often in their natural environments). To replace this breeding and supply of NHPs in North America would take years and would significantly impact much of the available financial resources and funding for the actual research.

Like many others involved in laboratory animal medicine, we would look forward to a future where research performed to address these critical questions can be done without the use of live animals. But, at the same time, current laws and regulations require this kind of research before lifesaving medicines and treatments are approved. Researchers must rely on live-animal studies to safely develop these treatments.

According to the complaint, many airlines refuse to transport animals to support these vital scientific discoveries, although the airlines will transport the same animal for non-research purposes, such as for pets or zoos. We believe as long as the government requires this research, it should enforce its laws in a way which does not undermine these essential research requirements. This arbitrary delineation by the airlines - which we understand has no transportation related purpose - threatens the progress of crucial research, research which historically has eradicated diseases and allowed key mechanistic understanding of many translational diseases.

We urge the Department of Transportation ("DOT") to investigate the complaint filed by NABR and to require all airlines to eliminate policies which discriminate against animal carriage. This is especially critical in transportation for legal, legitimate, necessary and appropriate essential and life enhancing biomedical research. We respectfully request the DOT take these actions to ensure the continued progress of essential biomedical research.

Sincerely,

A handwritten signature in black ink, reading "Marek A. Niekrasz". The signature is fluid and cursive, with a large initial 'M' and a stylized 'N'.

Marek A. Niekrasz, DVM, DACLAM
APV President